

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

HEATHER JANSEN,

Plaintiff,

- against -

Civil Case No. 1:23-cv-06756-HG

THE CITY OF NEW YORK, NEW YORK CITY
DEPARTMENT OF EDUCATION, DAVID C.
BANKS, in his official capacity as Chancellor of the
New York City Department of Education and
MARION WILSON, in her official capacity a
Superintendent of District 31 of the New York City
Department of Education,

Defendants.

**DECLARATION OF OLIVIA M. CLANCY IN SUPPORT OF PLAINTIFFS' OPPOSITION
TO DEFENDANTS' MEMORANDUM OF LAW IN SUPPORT OF ITS MOTION TO
DISMISS THE AMENDED COMPLAINT**

I, Olivia M. Clancy, declare as follows:

1. I am an attorney with the law firm of Shegerian & Associates, counsel to Plaintiff Heather Jansen ("Jansen"). I respectfully submit this Declaration in support of Plaintiffs' Memorandum of Law in Opposition to Defendants' Memorandum of Law in Support of its Motion to Dismiss the First Amended Complaint (the "Complaint" or "FAC" (Dkt. 31)).

2. Attached as Exhibit 1 is a true and correct copy of the Amended Complaint (Dkt. 31).

3. Attached as Exhibit 2 is a true and correct copy of the Inclusive Teacher Recruitment and Hiring Initiative municipal policy and custom enacted by Chancellor David C. Banks.

4. Attached as Exhibit 3 is a true and correct image of a training slide during Plaintiff's training.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 26, 2024

Respectfully submitted,

SHEGERIAN & ASSOCIATES

/s/ Olivia M. Clancy

Olivia M. Clancy

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CERTIFICATE OF SERVICE

I, Olivia M. Clancy, hereby certify that a copy of the foregoing Plaintiffs' Memorandum of Law in Opposition to Defendants' Memorandum of Law in Support of its Motion to Dismiss the Amended Complaint, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing ("NEF") on January 26, 2024.

Dated: January 26, 2024

/s/ Olivia M. Clancy